

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

DENNIS GROMOV, individually and on	)	
behalf of all other similarly situated,	)	
	)	
Plaintiff,	)	Case No. 1:22-cv-06918
	)	
v.	)	Hon. Franklin U. Valderrama
	)	
BELKIN INTERNATIONAL, INC.,	)	Magistrate Judge Gabriel A. Fuentes
	)	
Defendant.	)	

**DEFENDANT BELKIN INTERNATIONAL, INC.'S  
MOTION FOR ENTRY OF CONFIDENTIALITY ORDER**

Defendant Belkin International, Inc. (“Belkin”), by and through its undersigned counsel, respectfully moves the Court for entry of a Confidentiality Order, based on the Model Confidentiality Order in this District. In support of its Motion, Belkin states as follows:

1. The parties to this action are currently engaged in discovery. Plaintiff Gromov (“Plaintiff”) has served Belkin with document requests pursuant to Federal Rule of Civil Procedure 34, which call for the production of documents containing Belkin’s commercially sensitive, proprietary, and trade secret business information. In addition, certain of the documents sought by Plaintiff Gromov’s document requests seek documents that contain the Personally Identifying Information (“PII”) of Belkin’s customers. As such, Belkin requires that certain documents and information that will be produced by it in this action be produced with a Confidential designation, pursuant to its proposed Confidentiality Order, which is substantively identical to the District’s Model Confidentiality Order.

2. The parties have met and conferred regarding Belkin’s proposed draft Confidentiality Order, but counsel for Plaintiff has indicated that Plaintiff will not consent to entry of Belkin’s proposed Confidentiality Order (attached hereto as Exhibit B).

3. Accordingly, Belkin respectfully files this Motion and submits that good cause exists for the entry of Belkin's proposed Confidentiality Order to protect Belkin's confidential information under Federal Rule of Civil Procedure 26(c), including Belkin's commercially sensitive, proprietary, and trade secret business information.

4. Attached hereto as Exhibit A is a redlined version of the Confidentiality Order that Belkin proposes to be entered by the Court, as compared against the Model Confidentiality Order in this District. Attached hereto as Exhibit B is a clean version of the Confidentiality Order that Belkin respectfully requests that the Court enter.

WHEREFORE, Defendant Belkin respectfully requests that the Court enter the Confidentiality Order attached hereto as Exhibit B.

Dated: August 17, 2023

Respectfully submitted,

By: /s/ Patricia Mathy

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